



THREE GATEWAY CENTER
100 Mulberry Street, 15th Floor
Newark, NJ 07102
T: 973.757.1100
F: 973.757.1090
WALSH.LAW

Liza M. Walsh
Direct Dial: (973) 757-1101
lwalsh@walsh.law

April 15, 2024

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: **In re: Insulin Pricing Litigation**
No. 2:23-md-03080-BRM-RLS
MDL No. 3080
ESI Protocol – Declarations on Hyperlinked Documents

Dear Judge Singh:

Pursuant to Your Honor's request at the April 8, 2024 hearing, and Defendants' request for an extension filed on April 12, I am writing on behalf of all Defendants regarding a date by which they will submit declarations on the issue of hyperlinked documents. To allow sufficient time to prepare the declarations, the parties have agreed to the following schedule:

- Defendants file declarations and any supplemental briefing (no more than 5 pages) by May 1, 2024.
- Plaintiffs file any responsive supplemental briefing (no more than 5 pages) by May 8, 2024.

The parties have not, however, been able to agree about whether Your Honor permitted Plaintiffs to also file a reply declaration. While Defendants do not object to Plaintiffs filing a surreply (if helpful for Your Honor), Defendants respectfully request that, should your Honor permit a surreply, Plaintiffs be limited to a five-page surreply with no additional declarations.

If the foregoing request is acceptable to Your Honor, we respectfully request that this letter be "So Ordered" and entered on the docket. Thank you for your time and attention.

April 15, 2024
Page 2

Respectfully submitted,

s/ Liza M. Walsh

Liza M. Walsh

cc: All Counsel of Record (via ECF)

IT IS on this ____ day of April, 2024
So Ordered:

Hon. Rukhsanah L. Singh, U.S.M.J.